

Gulfco Marine Maintenance Superfund Site Comments and Responses

REMOVAL ACTION REPORT

1. Comment: (Section 2.2, p. 6; Section 2.6.1, p. 9; and Section 2.6.2, p. 10) *The Report provides several scheduled date for various disposal activities, which occurred near the time that the Report was submitted. The Report shall be revised to provide the actual dates for these activities.*

Response: The referenced sections of the Report have been revised to reflect the actual or scheduled disposal dates for the activities described.

2. Comment: (Section 3.2, p. 16): *The Report states that the soil concentrations were within the acceptable risk range. The Report shall also include that the risk range is based on an industrial/commercial exposure scenario.*

Response: The specified wording has been added to this section. In addition, per an exchange of voice mail messages between Eric Pastor of Pastor, Behling & Wheeler, LLC and Gary Miller of EPA subsequent to receipt of the EPA's review comments, the last sentence in this section, referring to preparation of an addendum to the Baseline Human Health Risk Assessment (BHHRA), has been deleted.

3. Comment: (Section 4.0, p. 17): *The text of the Report shall document the objectives of the Settlement Agreement and describe how those objectives were met.*

Response: In response to this comment, Section 4.0 has been revised to the following: "The purpose of the Removal Action at the Gulfco AST Tank farm was to remove and properly dispose of contents of the ASTs; remove, demolish and dispose of the tanks in the AST Tank Farm; and decontaminate the AST Tank Farm containment areas. The overarching Removal Action objectives as set forth in Paragraph 31.f of the Settlement Agreement are to protect the public health, welfare, or the environment. These objectives have been met through performance of the Removal Action activities documented in this report."

4. Comment: (Appendix A, Photograph 18): *The caption for this photograph describes a view to the north. The view is actually to the south and the caption shall be corrected to reflect this.*

Response: The photograph caption has been corrected as noted. Due to Comment 6 below, the photographs are now provided in Appendix B.

5. Comment: *The Report shall provide the demobilization date for the removal action (prior to the final disposal of the remaining containers).*

Response: The following sentence has been added to the end of the first paragraph in Section 2.0 to address this comment: "EEI demobilized all equipment from the Site (except for the roll-off boxes awaiting disposal slots as described previously) on January 27, 2011."

6. Comment: *The Report shall include the removal action work plan from the Settlement Agreement as an appendix to this Report.*

9160361



Response: The removal action work plan from the Settlement Agreement has been added as Appendix A to this report and all other appendices to the Report have been renumbered accordingly.